

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JIMMY LYONS, JACQUELINE LYONS,
LISA CHAMBERLIN ENGELHARDT,
GERALD COULTHURST, ENRIQUE
DOMINGUEZ, FRANCES ERVING,
JOHNNIE ERVING, ANTHONY
PAPAPIETRO, and SHEILA D. HEARD
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

LITTON LOAN SERVICING LP,
GOLDMAN SACHS GROUP, INC., ARROW
CORPORATE MEMBER HOLDINGS LLC,
SAXON MORTGAGE SERVICES, INC.,
MORGAN STANLEY, OCWEN
FINANCIAL CORPORATION, OCWEN
LOAN SERVICING, LLC, ASSURANT, INC.
(d/b/a Assurant Specialty Property),
AMERICAN SECURITY INSURANCE
COMPANY, STANDARD GUARANTY
INSURANCE COMPANY, AMERICAN
MODERN INSURANCE GROUP, and
AMERICAN MODERN HOME
INSURANCE COMPANY,

Defendants.

Case No. 1:13-cv-00513-ALC-HBP

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Melvin A. Brosterman, Esq., dated February 20, 2015, and upon the exhibits attached thereto, the accompanying Memorandum of Law in support of this motion, the Memoranda of Law filed by the other defendants in this action in support of their motions to dismiss the Second Amended Class Action Complaint, and the pleadings herein, Defendants The Goldman Sachs Group, Inc. and Arrow Corporate Member Holdings LLC (collectively, “Defendants”) will move this Court,

before the Honorable Andrew L. Carter Jr., United States District Judge, for entry of an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice the Second Amended Class Action Complaint (ECF Nos. 93 & 93-1) as against Defendants and for such other and further relief as this Court deems necessary and proper.

Dated: February 20, 2015

Respectfully submitted,

/s/ Melvin A. Brosterman

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